

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10113-DPW
)	
REYLANDO REYES,)	
a/k/a REYLANDO RISE,)	
a/k/a RAYNALDO RISE,)	
a/k/a RAYLANDO RISE,)	
a/k/a RAY RISE,)	
)	
Defendant.)	

**ASSENTED-TO MOTION TO EXCLUDE THE TIME FROM
FEBRUARY 17, 2006 THROUGH APRIL 14, 2006,
AND FOR AN ORDER ON EXCLUDABLE DELAY**

The United States hereby moves move, pursuant to 18 U.S.C. §3161(h)(8)(A) and Section 5(c)(1)(A) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, to exclude the time within which trial must commence under 18 U.S.C. §3161(c)(1), excluding from such computation all time, commencing on February 17, 2006, and concluding on April 14, 2006 (date of by which the government must file its opposition to any suppression motion).

As grounds therefor, the undersigned states that at the Final Status Conference held on February 8, 2006, Counsel for Defendant, Stylianus Sinnis, Esq., requested additional time to file a suppression motion. The Court has granted counsel's request and has ordered that any suppression motion be filed by March 17, 2006, and any opposition by the government be filed by April 14, 2006.

Counsel for Defendant, Stylianus Sinnis, Esq., has given his assent to this motion.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice are served by granting the requested exclusion, and that said exclusion outweighs the best interest of the public and the defendants in a speedy trial, and, accordingly, exclude all time, **commencing on February 17, 2006 and concluding on April 14, 2006**, in computing the time within which trial must commence under 18 U.S.C. §3161, and request that the Court enter an Order of Excludable Delay.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
(617) 748-3103

Date: February 10, 2006

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
February 10, 2006

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, do hereby certify that I have this day served by electronic court filing a copy of the foregoing to Stylianus Sinnis, Esq., Federal Defender Office, 408 Atlantic Avenue, 3rd Floor, Boston, MA 02110.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY